From: <u>Carl Christensen</u>
To: <u>Jared Goerlitz</u>

Cc: Chris Wilcox; Ryan Supple; Darby Hanson; Sydney Maglio

Subject: Re: Major v. Holiday Watkins & Mann P.C.

Date: Thursday, August 15, 2024 8:14:15 PM

Attachments: image001.png

Hey Jared, we were already too deep in briefing. Just filed the motion. Call me to discuss if you want to resolve this.

I'm going to Iceland for 10 days on Wednesday. Ryan and Chris can help you if need be.



Carl Christensen

Attorney at Christensen Sampsel PLLC

Address 305 North Fifth Avenue, Suite 375, Minneapolis, MN 55401 Direct (612) 823-4427 Email carl@christensensampsel.com











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From: Jared Goerlitz < jgoerlitz@goerlitzlaw.com> Sent: Tuesday, August 13, 2024 9:52:17 AM

To: Carl Christensen <carl@christensensampsel.com>

Cc: Chris Wilcox <chris@christensensampsel.com>; Ryan Supple <ryan@christensensampsel.com>; Darby Hanson <darby@christensensampsel.com>; Sydney Maglio <sydney@christensensampsel.com>

Subject: RE: Major v. Holiday Watkins & Mann P.C.

Thanks, Carl. I understood that you would be providing the fee details so that we could see how you've arrived at your fee demand. Are you still planning to provide that detail for us to consider?

Thanks, Jared

Jared M. Goerlitz

Attorney/Owner



mailing address: P.O. Box 25194 | 7595 Currell Blvd | St. Paul, MN 55125 office address: The Reserve | 724 Bielenberg Dr. | St. Paul, MN 55125

phone: 651-237-3494 | cell: 612-987-6414 visit us online: www.goerlitzlaw.com

From: Carl Christensen <carl@christensensampsel.com>

Sent: Tuesday, August 13, 2024 7:15 AM

To: Jared Goerlitz < jgoerlitz@goerlitzlaw.com>

Cc: Chris Wilcox <chris@christensensampsel.com>; Ryan Supple <ryan@christensensampsel.com>; Darby Hanson <darby@christensensampsel.com>; Sydney Maglio <sydney@christensensampsel.com>

Subject: Re: Major v. Holiday Watkins & Mann P.C.

Jared,

Please find the *Beckler v. Rent Recovery Solutions*, where the court awarded \$9,840 in fees for a straightforward FDCPA matter. We would argue that this case is more complicated and higher stakes (your client threatened foreclosure).

Also find the Knapp v. Compass matter where my non-loadstar rate of \$500 an hour was approved by the Court. As I mentioned, our billing for Major is a combination of contingency and straight hourly. My contingency rate is \$550 an hour. Also, as you will find from our briefing, Nick Major paid a \$5000 retainer.

Finally, as I mentioned on the phone, the second Rule 68 offer presents a novel issue of law and complexity to this matter. If you seek to argue that this is a simple matter for which fees should be minimal, the second Rule 68 offer cuts against such an argument.

I would prefer just to work this out. However, we have to file our motion very soon, which is increasing our fees.

Ball is in your court. Thank you.

Yours,

Carl

From: Jared Goerlitz < igoerlitz@goerlitzlaw.com >

Date: Monday, August 12, 2024 at 2:57 PM

To: Carl Christensen < carl@christensensampsel.com >

Cc: Chris Wilcox < chris@christensensampsel.com">chris@christensensampsel.com>, Ryan Supple < ryan@christensensampsel.com>, Sydney Maglio < sydney@christensensampsel.com>

Subject: RE: Major v. Holiday Watkins & Mann P.C.

Yes, from my standpoint, we have satisfied Rule 7.1. Please do sent over the resources you referenced in our call.

Thanks, Jared

Jared M. Goerlitz

Attorney/Owner



mailing address: P.O. Box 25194 | 7595 Currell Blvd | St. Paul, MN 55125 office address: The Reserve | 724 Bielenberg Dr. | St. Paul, MN 55125

phone: 651-237-3494 | cell: 612-987-6414 visit us online: www.goerlitzlaw.com

From: Carl Christensen < <u>carl@christensensampsel.com</u>>

Sent: Monday, August 12, 2024 2:55 PM **To:** Jared Goerlitz < <u>igoerlitz@goerlitzlaw.com</u>>

Cc: Chris Wilcox < christensensampsel.com; Ryan Supple < ryan@christensensampsel.com; Darby Hanson

<<u>darby@christensensampsel.com</u>>; Sydney Maglio <<u>sydney@christensensampsel.com</u>>

Subject: Re: Major v. Holiday Watkins & Mann P.C.

Jared,

Thank you for meeting and conferring about the Major case.

Upon review of Rule 54, we will file our motion tomorrow. I trust that our meet and confer today is sufficient under Rule 7.1 for that motion. I just thought I had more time.

Please let me know if you want to meet and confer again.

Thank you.

Yours,

Carl

From: Jared Goerlitz < jgoerlitz@goerlitzlaw.com > Date: Monday, August 12, 2024 at 12:31 PM

To: Carl Christensen < carl@christensensampsel.com >

Cc: Chris Wilcox <chris@christensensampsel.com>, Ryan Supple <ra>ryan@christensensampsel.com>,</ra>

Darby Hanson < <u>darby@christensensampsel.com</u>> **Subject:** Re: Major v. Holiday Watkins & Mann P.C.

I can do either, but would prefer 1:30pm.

Thanks, Jared

Jared M. Goerlitz

Attorney/Owner
Goerlitz Law, PLLC
| P.O. Box 25194, 7595 Currell Blvd.
| St. Paul, MN 55125

| phone: 651-237-3494 | cell: 612-987-6414

visit us online: www.goerlitzlaw.com

On Aug 12, 2024, at 12:06 PM, Carl Christensen < carl@christensensampsel.com > wrote:

Hi Jared,

What time today works for you? How is today at 1:30 or 4:00 pm?

Yours,

Carl

From: Jared Goerlitz < jgoerlitz@goerlitzlaw.com >

Date: Friday, August 9, 2024 at 4:47 PM

To: Chris Wilcox < chris@christensensampsel.com>

Cc: Ryan Supple <ru>
<rr>
ryan@christensensampsel.com

, Darby Hanson

<darby@christensensampsel.com>, Carl Christensen <carl@christensensampsel.com>

Subject: RE: Major v. Holiday Watkins & Mann P.C.

Sorry, Chris, I've been putting out fires all week. I'm available Monday to discuss. Please let me know what works best for you before 10:30 and after 2pm.

Thanks, Jared

Jared M. Goerlitz

Attorney/Owner

<image001.png>

mailing address: P.O. Box 25194 | 7595 Currell Blvd | St. Paul, MN 55125 office address: The Reserve | 724 Bielenberg Dr. | St. Paul, MN 55125

phone: 651-237-3494 | cell: 612-987-6414 visit us online: www.goerlitzlaw.com

From: Chris Wilcox <chris@christensensampsel.com>

Sent: Tuesday, August 6, 2024 1:09 PM

To: Jared Goerlitz < jgoerlitz@goerlitzlaw.com>

Cc: Ryan Supple <ra>ryan@christensensampsel.com</u>>; Darby Hanson darby@christensensampsel.com>; Carl

Christensen < carl@christensensampsel.com > Subject: Re: Major v. Holiday Watkins & Mann P.C.

Hi Jared.

Did you look into this and are you available to meet and confer.

Chris



Christopher Wilcox

Attorney at Christensen Sampsel PLLC

Address 305 North Fifth Avenue, Suite 375, Minneapolis, MN 55401 Direct (612) 823-3831 Email chris@christensensampsel.com



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From: Carl Christensen < carl@christensensampsel.com >

Date: Sunday, August 4, 2024 at 10:00 AM **To:** Jared Goerlitz < <u>igoerlitz@goerlitzlaw.com</u>>

Cc: Chris Wilcox < chris@christensensampsel.com>, Ryan Supple

<ru><ru>yan@christensensampsel.com</ru></ru>, Darby Hanson darby@christensensampsel.com

Subject: Re: Major v. Holiday Watkins & Mann P.C.

Hi Jared,

I did not hear back from you. We do need to

Meet and confer. Can you connect with Chris next week.



Carl Christensen

Attorney at Christensen Sampsel PLLC

Address 305 North Fifth Avenue, Suite 375, Minneapolis, MN 55401 Direct (612) 823-4427 Email carl@christensensampsel.com



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From: Carl Christensen < carl@christensensampsel.com>

Sent: Thursday, August 1, 2024 10:34:42 AM **To:** Jared Goerlitz < <u>igoerlitz@goerlitzlaw.com</u>>

Cc: Chris Wilcox < christensensampsel.com; Ryan Supple < ryan@christensensampsel.com; Darby

Hanson < darby@christensensampsel.com >

Subject: Re: Major v. Holiday Watkins & Mann P.C.

Hi Jared,

Please accept this email as an attempt to meet and confer about your clients improper second Rule 68 offer after our acceptance of the first Rule 68 offer. I can discuss this will you tomorrow by telephone or Zoom.

Indeed, Rule 68 does not dispose of issues. It merely creates a judgment—that is, one judgment.

We have done some research, and I can't find anything directly on point. Generally, a court must allow an accepted Rule 68 offer to proceed to judgment. The judgment then is either static (i.e. in the context of a total obligation offer) or it the Court can add amounts outside the judgment (i.e. in the context of a damages only offer). Here, the result of the Rule 68 offer is one judgment—either one for which the amount is fully determined, or one for which is partly determined and requires additional determinations to finally determine. See e.g. Hennessy v. Daniels L. Off., 270 F.3d 551 (8th Cir. 2001). I cannot find any case that waivers from that and allows the offering of two consent judgments.

The caselaw consistently refers to the entry of judgment as a singularity even when further amounts are to be determined. In the case where there are amounts to be added, the case law all recites to adding to the "judgment"—not creating a new judgment. In that respect, the "judgment" reference is not a money judgment—it is the final disposition of the matter (i.e. the judgment to be entered). The federal rule does not make the "total obligation" or "damages" distinction, but the state rule does, and federal courts have looked to the state courts to inform the meaning of the underlying Rule 68 offer under contract law.

This second Rule 68 offer tactic is only going to increase the fees and cost judgment. I appreciate that you think that this second Rule 68 offer may offer your client some protection against further fees in case the Court awards less than \$5000 in fees. However, what is also will do is set us on a path where we are briefing a novel issue to the Court related to Rule 68, and one for which we would expect to be able to seek fees related to.

I believe I have a responsibility to try to resolve this before undertaking the efforts to brief the issue. I can discuss on the phone tomorrow. Please let me know your availability to chat.

Yours,

Carl

From: Jared Goerlitz < jgoerlitz@goerlitzlaw.com >

Date: Wednesday, July 31, 2024 at 7:42 AM

To: Carl Christensen < carl@christensensampsel.com >

Cc: Chris Wilcox < chris@christensensampsel.com, Ryan Supple

<ryan@christensensampsel.com>

Subject: RE: Major v. Holiday Watkins & Mann P.C.

Hi Carl:

I have not researched that issue, but we do believe fees and costs are a separate legal issue that results in a separate judgment allowing a separate Rule 68 offer.

Thanks, Jared

Jared M. Goerlitz

Attorney/Owner

<image001.png>

mailing address: P.O. Box 25194 | 7595 Currell Blvd | St. Paul, MN 55125 office address: The Reserve | 724 Bielenberg Dr. | St. Paul, MN 55125

phone: 651-237-3494 | cell: 612-987-6414 visit us online: www.goerlitzlaw.com

From: Carl Christensen < carl@christensensampsel.com>

Sent: Tuesday, July 30, 2024 1:50 PM

To: Jared Goerlitz < jgoerlitz@goerlitzlaw.com>

Cc: Chris Wilcox <<u>chris@christensensampsel.com</u>>; Ryan Supple <<u>ryan@christensensampsel.com</u>>

Subject: Re: Major v. Holiday Watkins & Mann P.C.

Jared,

Do you have any authority that says that you can make a second Rule 68 offer on fees when we have accepted the first Rule 68 offer on liability?

Thanks.

From: Jared Goerlitz < jgoerlitz@goerlitzlaw.com >

Date: Monday, July 29, 2024 at 12:45 PM

To: Carl Christensen < carl@christensensampsel.com >

Cc: Chris Wilcox < chris@christensensampsel.com>, Ryan Supple

<ryan@christensensampsel.com>

Subject: RE: Major v. Holiday Watkins & Mann P.C.

HI Carl:

This is intended to be our only offer and as a way to possibly cut off any additional fees incurred.

Thanks, Jared

Jared M. Goerlitz

Attorney/Owner

<image002.png>

mailing address: P.O. Box 25194 | 7595 Currell Blvd | St. Paul, MN 55125 office address: The Reserve | 724 Bielenberg Dr. | St. Paul, MN 55125

phone: 651-237-3494 | cell: 612-987-6414 visit us online: www.goerlitzlaw.com

From: Carl Christensen < carl@christensensampsel.com>

Sent: Monday, July 29, 2024 10:05 AM

To: Jared Goerlitz < igoerlitz@goerlitzlaw.com>

Cc: Chris Wilcox <<u>chris@christensensampsel.com</u>>; Ryan Supple <<u>ryan@christensensampsel.com</u>>

Subject: Re: Major v. Holiday Watkins & Mann P.C.

Jared,

Can you please advise what you think this second Rule 68 is supposed to achieve? I have never seen stacked Rule 68 offers. Do you mean to just make an offer? Or are you intending for this to be your only offer?

Please do advise.

Yours,

Carl

From: Jared Goerlitz < jgoerlitz@goerlitzlaw.com >

Date: Friday, July 26, 2024 at 11:42 AM

To: Carl Christensen < carl@christensensampsel.com >

Cc: Chris Wilcox < chris@christensensampsel.com>, Ryan Supple

<ryan@christensensampsel.com>

Subject: RE: Major v. Holiday Watkins & Mann P.C.

Please see the attached also being sent by mail.

Thanks, Jared

Jared M. Goerlitz

Attorney/Owner

<image003.png>

mailing address: P.O. Box 25194 | 7595 Currell Blvd | St. Paul, MN 55125 office address: The Reserve | 724 Bielenberg Dr. | St. Paul, MN 55125 phone: 651-237-3494 | cell: 612-987-6414

phone: 651-237-3494 | cell: 612-987-6414 visit us online: www.goerlitzlaw.com

From: Carl Christensen < <u>carl@christensensampsel.com</u>>

Sent: Wednesday, July 24, 2024 12:32 PM **To:** Jared Goerlitz < jgoerlitz@goerlitzlaw.com>

Cc: Chris Wilcox christensensampsel.com; Ryan Supple ryan@christensensampsel.com;

Subject: Re: Major v. Holiday Watkins & Mann P.C.

SETTLEMENT COMMUNICATION PURSUANT TO RULE 408

Hi Jared,

Total Fees = \$29,505.00 and costs \$873.06. G. TOTAL = \$30,378.06.

Major will release all claims for the fees component for \$30,000, conditioned

- on payment of the \$3,000 consent judgment amount;
- Christensen Sampsel PLLC only to provide 1099;
- language in settlement to say that the claims contained statutory fee provision;
- parties to otherwise bear their costs and fees.

I look forward to resolving this matter.

Yours,

Carl

From: Jared Goerlitz < jgoerlitz@goerlitzlaw.com > Date: Wednesday, July 24, 2024 at 11:24 AM

To: Carl Christensen < carl@christensensampsel.com >

Cc: Chris Wilcox < chris@christensensampsel.com>, Ryan Supple

<ryan@christensensampsel.com>

Subject: RE: Major v. Holiday Watkins & Mann P.C.

HI Carl:

Yes, please provide a demand on the attorney fees request, which I hope will be reasonable so that we can wrap this up.

Thanks, Jared

Jared M. Goerlitz

Attorney/Owner

<image004.png>

mailing address: P.O. Box 25194 | 7595 Currell Blvd | St. Paul, MN 55125 office address: The Reserve | 724 Bielenberg Dr. | St. Paul, MN 55125

phone: 651-237-3494 | cell: 612-987-6414 visit us online: www.goerlitzlaw.com

From: Carl Christensen < carl@christensensampsel.com >

Sent: Wednesday, July 24, 2024 11:02 AM **To:** Jared Goerlitz < <u>igoerlitz@goerlitzlaw.com</u>>

Cc: Chris Wilcox <<u>chris@christensensampsel.com</u>>; Ryan Supple <<u>ryan@christensensampsel.com</u>>

Subject: Re: Major v. Holiday Watkins & Mann P.C.

Jared,

Please find attached and served upon you on today's date, Nick Major's acceptance of your client's Rule 68 offer.

Please do advise if you would like to settle the fees portion of the case short of motion practice.

Thank you.

Yours,

Carl

From: Jared Goerlitz < igoerlitz@goerlitzlaw.com >

Date: Thursday, July 11, 2024 at 1:55 PM

To: Carl Christensen < carl@christensensampsel.com >

Cc: Chris Wilcox < chris@christensensampsel.com>, Ryan Supple

<ryan@christensensampsel.com>

Subject: RE: Major v. Holiday Watkins & Mann P.C.

Please see the attached also being sent by mail.

Thanks, Jared

Jared M. Goerlitz

Attorney/Owner

<image005.png>

mailing address: P.O. Box 25194 | 7595 Currell Blvd | St. Paul, MN 55125 office address: The Reserve | 724 Bielenberg Dr. | St. Paul, MN 55125

phone: 651-237-3494 | cell: 612-987-6414 visit us online: www.goerlitzlaw.com

From: Carl Christensen < carl@christensensampsel.com >

Sent: Monday, July 8, 2024 1:56 PM

To: Jared Goerlitz < igoerlitz@goerlitzlaw.com>

Cc: Chris Wilcox <<u>chris@christensensampsel.com</u>>; Ryan Supple <<u>ryan@christensensampsel.com</u>>

Subject: Re: Major v. Holiday Watkins & Mann P.C.

SETTLEMENT COMMUNICATION PURSUANT TO RULE 408

Hi Jared,

My client has given me authority to settle this case for the following:

- Payment of \$65,000.00.
- Release of all claims and dismissal with prejudice against your client.
- Statement in settlement agreement that it is settlement of claims that include statutory fee shifting language.
- The parties to otherwise bear their own costs.

The complaint sets out our client's damages claim with specificity, especially the emotional distress element.

Also, we just had another case like this where a debt collector attorney tried to claim on debt that was uncollectable by virtual of the case's automatic dismissal via Minn. R. Civ. P. 5.04. Case 0:23-cv-01250-PJS-DJF Lindell v. Sanford, Pierson, Thone & Strean, PLC.

Le.	t me	know	IT :	you	want	to	discuss.
-----	------	------	------	-----	------	----	----------

Thank you.

Yours,

Carl

From: Jared Goerlitz < jgoerlitz@goerlitzlaw.com >

Date: Monday, July 8, 2024 at 1:06 PM

To: Carl Christensen < carl@christensensampsel.com >

Cc: Chris Wilcox <chris@christensensampsel.com>, Lisa Robertson Lisa@christensensampsel.com>, Ryan

Supple < ryan@christensensampsel.com >

Subject: Re: Major v. Holiday Watkins & Mann P.C.

Hi Carl:

Page 11 of 15

Please let me know where we are at here. Thanks, Jared

Jared M. Goerlitz

Attorney/Owner Goerlitz Law, PLLC | P.O. Box 25194, 7595 Currell Blvd. | St. Paul, MN 55125

| phone: 651-237-3494 | cell: 612-987-6414

visit us online: www.goerlitzlaw.com

On Jul 2, 2024, at 5:25 PM, Carl Christensen < carl@christensensampsel.com > wrote:

Jared,

I owe you a response. Will get you one soon.

From: Jared Goerlitz < jgoerlitz@goerlitzlaw.com>

Date: Tuesday, July 2, 2024 at 1:44 PM

To: Chris Wilcox < chris@christensen , Carl Christensen

<carl@christensensampsel.com>

Cc: Lisa Robertson < <u>lisa@christensensampsel.com</u>>, Ryan Supple

<ryan@christensensampsel.com>

Subject: RE: Major v. Holiday Watkins & Mann P.C.

Chris/Carl:

Any update on my request below to get discussions going for the dismissal of Halliday Watkins short of a global resolution? Please let me know.

Thanks, Jared

Jared M. Goerlitz

Attorney/Owner

<image005.png>

mailing address: P.O. Box 25194 | 7595 Currell Blvd | St. Paul, MN 55125 office address: The Reserve | 724 Bielenberg Dr. | St. Paul, MN 55125

phone: 651-237-3494 | cell: 612-987-6414 visit us online: www.goerlitzlaw.com

From: Chris Wilcox < chris@christensensampsel.com>

Sent: Tuesday, June 25, 2024 10:17 AM

To: Jared Goerlitz < <u>igoerlitz@goerlitzlaw.com</u>>; Carl Christensen

<carl@christensensampsel.com>

Cc: Lisa Robertson < <u>lisa@christensensampsel.com</u>>; Ryan Supple

<ryan@christensensampsel.com>

Subject: Re: Major v. Holiday Watkins & Mann P.C.

Fire away.



Christopher Wilcox

Attorney at Christensen Sampsel PLLC

Address 305 North Fifth Avenue, Suite 375, Minneapolis, MN 55401 Direct (612) 823-3831 Email chris@christensensampsel.com



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From: Jared Goerlitz < igoerlitz@goerlitzlaw.com>

Date: Tuesday, June 25, 2024 at 10:15 AM

To: Chris Wilcox < christensen, Carl Christensen

<<u>carl@christensensampsel.com</u>>

Cc: Lisa Robertson < lisa@christensensampsel.com >, Ryan Supple

<ryan@christensensampsel.com>

Subject: RE: Major v. Holiday Watkins & Mann P.C.

Thanks, Chris. Please see the attached.

Thanks, Jared

Jared M. Goerlitz

Attorney/Owner

<image005.png>

mailing address: P.O. Box 25194 | 7595 Currell Blvd | St. Paul, MN 55125 office address: The Reserve | 724 Bielenberg Dr. | St. Paul, MN 55125

phone: 651-237-3494 | cell: 612-987-6414 visit us online: www.goerlitzlaw.com

From: Chris Wilcox < chris@christensensampsel.com>

Sent: Tuesday, June 25, 2024 9:47 AM

To: Jared Goerlitz < <u>igoerlitz@goerlitzlaw.com</u>>; Carl Christensen

<carl@christensensampsel.com>

Cc: Lisa Robertson < <u>lisa@christensensampsel.com</u>>; Ryan Supple

<ryan@christensensampsel.com>

Subject: Re: Major v. Holiday Watkins & Mann P.C.

Hi Jared,

Carl is OOO this week. The additional extension is okay by me. Go ahead and circulate a new stipulation and proposed order.

On the potential for resolution short of global resolution, I'll have to check in with Carl and circle back.

Chris



Christopher Wilcox

Attorney at Christensen Sampsel PLLC

Address 305 North Fifth Avenue, Suite 375, Minneapolis, MN 55401 Direct (612) 823-3831 Email chris@christensensampsel.com



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From: Jared Goerlitz < jgoerlitz@goerlitzlaw.com >

Date: Tuesday, June 25, 2024 at 9:40 AM

To: Carl Christensen < carl@christensensampsel.com>, Chris Wilcox

<<u>chris@christensensampsel.com</u>>

Cc: Chris Wilcox < chris@christensensampsel.com>, Lisa Robertson

<a href="mailto:RyanSupple

<ryan@christensensampsel.com>

Subject: RE: Major v. Holiday Watkins & Mann P.C.

Hi Carl:

Any update on this? Is there any interest/offer to get Halliday Watkins out without a global resolution?

Also, given the extension obtained by Connexus, are you fine also giving us until July 11th to answer/respond?

Thanks, Jared

Jared M. Goerlitz

Attorney/Owner

<image005.png>

mailing address: P.O. Box 25194 | 7595 Currell Blvd | St. Paul, MN 55125 office address: The Reserve | 724 Bielenberg Dr. | St. Paul, MN 55125

phone: 651-237-3494 | cell: 612-987-6414 visit us online: www.goerlitzlaw.com

From: Carl Christensen < carl@christensensampsel.com >

Sent: Tuesday, June 11, 2024 3:03 PM

To: Jared Goerlitz < <u>igoerlitz@goerlitzlaw.com</u>>; Chris Wilcox

<chris@christensensampsel.com>

Cc: Chris Wilcox < chris@christensensampsel.com>; Lisa Robertson

squam@christensensampsel.com

Subject: Re: Major v. Holiday Watkins & Mann P.C.

Jared,

These look fine. You can attach my e-signature to the stip.

Yours,

Carl

From: Jared Goerlitz < jgoerlitz@goerlitzlaw.com >

Date: Tuesday, June 11, 2024 at 10:07 AM

To: Carl Christensen < carl@christensensampsel.com>, Chris Wilcox

<<u>chris@christensensampsel.com</u>>

Cc: Chris Wilcox < chris@christensensampsel.com>, Lisa Robertson

lisa@christensensampsel.com, Ryan Supple

<ryan@christensensampsel.com>

Subject: RE: Major v. Holiday Watkins & Mann P.C.

Hi Carl:

Please find the draft stipulation and proposed order for a two-week extension. Please let me know if this is acceptable and I am authorized to add your e-signature.

Thanks, Jared

Jared M. Goerlitz

Attorney/Owner

<image005.png>

mailing address: P.O. Box 25194 | 7595 Currell Blvd | St. Paul, MN 55125 office address: The Reserve | 724 Bielenberg Dr. | St. Paul, MN 55125

phone: 651-237-3494 | cell: 612-987-6414 visit us online: www.goerlitzlaw.com

From: Jared Goerlitz

Sent: Monday, June 10, 2024 3:10 PM

To: Carl Christensen < <u>carl@christensensampsel.com</u>>; Chris Wilcox

<chris@christensensampsel.com>

Cc: Chris Wilcox < <u>chris@christensensampsel.com</u>>; Lisa Robertson

a@christensensampsel.com
; Ryan Supple <ryan@christensensampsel.com

Subject: RE: Major v. Holiday Watkins & Mann P.C.

Hi Carl:

I left you a telephone message as well. I will be representing Halliday, Watkins & Mann.

First, I need to get an extension to answer to see if we can resolve this matter. Then, second, I need to discuss the possibility of resolving the claims against Halliday, Watkins & Mann.

Thanks, Jared

Jared M. Goerlitz

Attorney/Owner

<image005.png>

mailing address: P.O. Box 25194 | 7595 Currell Blvd | St. Paul, MN 55125 office address: The Reserve | 724 Bielenberg Dr. | St. Paul, MN 55125

phone: 651-237-3494 | cell: 612-987-6414 visit us online: www.goerlitzlaw.com

From: Carl Christensen < <u>carl@christensensampsel.com</u>>

Sent: Thursday, May 23, 2024 9:53 AM

To: Jared Goerlitz < jgoerlitz@goerlitzlaw.com >; Chris Wilcox

<chris@christensensampsel.com>

Cc: Chris Wilcox < <u>chris@christensensampsel.com</u>>; Lisa Robertson

<<u>lisa@christensensampsel.com</u>>; Ryan Supple <<u>ryan@christensensampsel.com</u>>

Subject: Major v. Holiday Watkins & Mann P.C.

Jared,

Please find courtesy copies of the matter we filed on Tuesday.

Yours,

Carl



Carl E. Christensen

Attorney, Christensen Sampsel PLLC

Direct (612) 823-4427

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